

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

PLAINTIFF'S MOTION TO SEAL

1. I, the plaintiff, re-submit this **motion to seal** the attached or accompanying document and exhibit, pursuant to the court's order of 4-10-24 and pursuant to Fed. Civ. Rule 83(c), titled as "[REDACTED] [CONFIDENTIAL] MOTION FOR RECONSIDERATION OF THE COURT'S 3-6-24 ORDER TO UNSEAL THE PLAINTIFF'S 3-1-24 MOTION TO SEAL, and the accompanying exhibit titled as **Exhibit 1 – Redacted Motion to Seal**.
2. The factual and legal basis to justify sealing is based on the fact that this confidential motion contain references to confidential information including about third parties, which if disclosed publicly would impair the privacy interests attached thereto.
3. I request that the attached confidential motion and exhibit be sealed permanently or indefinitely. See Fed. Civ. Rule 83(c).¹ The court's order of 4-10-24 indicated that it may order sealing at Level I, so I ask for that consideration consistent with the court's order.
4. WHEREFORE, I, the plaintiff, respectfully request that this Honorable Court grant this Motion to Seal or such further relief as may be deemed just and proper.

Respectfully submitted,

/s/ Andre Bisasor

Andre Bisasor

April 11, 2024

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor

Andre Bisasor

¹ On 4-2-24, the clerk entered the following entry: "**Apr 2, 2024 NOTICE of ECF Filing Error re: 174 MOTION to Seal Document at Level II filed by Andre C. Bisasor. Motion should have been filed pursuant to LR 83.12(d). NO ACTION REQUIRED - FOR INFORMATIONAL PURPOSES ONLY AND MERELY INTENDED TO EDUCATE ALL PARTIES IN THE CASE. If the filing party has any questions concerning this notice, please contact the judge's case manager at 603-225-1423.(ko) ECF - Filing Error - Info Only**". This pertained to my last motion to seal on 4-1-24, which was filed separately via the ECF e-filing system and was separated from the confidential filings submitted directly to the clerk's office by email on 4-2-24. I therefore infer that the clerk's office was stating that I should not have separated the motion to seal from the confidential filings, but that I should have submitted them altogether at the same time to the clerk's office via email, and not via the ECF e-filing system. I thus now follow that understanding, by now re-submitting all three documents (motion to seal, motion for reconsideration and exhibit 1) directly to the clerk's office via email. This presented some confusion for me but I have landed on doing it this way as this makes the most sense of the clerk's 4-2-24 entry of notice of error.